

Before the
Federal Communications Commission
Washington, DC 20554

Optatus and Florence Chailla,

Complainants,

Vs.

Verizon of Pennsylvania, LLC

Respondent.

Proceeding Number 22-135
Bureau ID Number EB-22-MD-001

COMPLAINANT’S OBJECTIONS TO EXTENSION OF TIME

Section 1.46 of the Commission’s rules provides that “[i]t is the policy of the Commission that extensions of time are not routinely granted.”¹ However, the Commission may grant a waiver “if special circumstances warrant a deviation from the general rule and such deviation will serve the public interest.”² Section 1.46(c) requires motions for extension of time is filed less than 7 days prior to the filing day. The due date for filing an Answer was scheduled for April 20, 2022; the 7th day before its due date was Wednesday, April 13, 2022. Verizon of Pennsylvania did not orally notify Complainants of its intention to request an extension prior to its late filing today on Thursday, April 14, 2022.

¹ 47 CFR§1.46.

² See *Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (citing *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969), *aff’d*, 459 F.2d 1203 (1973), *cert. denied*, 409 U.S. 1027 (1972)).

Verizon of Pennsylvania, LLC has not shown good cause to provide reasonable grounds for the requested extension to file replies to the ***Complaint, Discovery*** or ***Statement of Stipulated Facts*** filed and provided to it in this proceeding. Verizon has not identified any complexities of fact, technical or legal questions that prevented it from answering in this proceeding timely. Merely a review of its own records or more so a review of the Exhibits provided with the Complaint; it could without more respond to the ***Complaint, Discovery*** and ***Statement of Stipulated Facts***. Scheduling conflicts due to holidays known to arise is not good cause grounds to extend Answering to May 11, 2022.

The FCC has a duty to serve the public interest. which is essentially “*what interests the public.*” Herein, the public interests are found in enforced consumer protection and privacy imperatives. No customer wants to be treated in a racially discriminatory, unfair or deceptive manner by any corporation, especially one that inculcates a monopolistic behavior shown by repeated failures to comply with regulatory and consumer protection laws.

Public interest would be served by denying an extension of time for Verizon of Pennsylvania, LLC to Answer especially absent a good cause shown. In the alternative, should the Commission find cause to grant an extension that it also find May 11, 2022 to be unnecessarily long. Complainants request that the extension of time be reduced to 10-days with an Order that the *Statement of Stipulated Facts* served on Verizon of Pennsylvania, LLC on March 30, 2022, that it Answers the served ***Statement of Stipulated Facts*** sent to it within 5-days of the Commission’s Order.

Dated: April 14, 2022

Respectfully submitted

Dr. Optatus N. Chailla

Dr. Optatus N. Chailla

Florence R. Parker Chailla, JD

Florence R. Parker Chailla, JD

Complainants

P.O. Box 111

Stroudsburg, PA 18360

thebusiness2@yahoo.com

CERTIFICATION

We, Complainants do hereby affirm that the foregoing statements made herein are true to the best of our knowledge and belief. We are aware that if any of the foregoing is willfully false, we may be subject to punishment.

Dated April 14, 2022

Respectfully submitted

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PROOF OF SERVICE

Today, Mr. Curtis L. Groves Managing Associate General Counsel for Verizon was served by email at:

curtis.groves@verizon.com

Mr. Groves was provided with Complainants' Objections to Extension of Time filed against his Motion to for an Extension filed with the Federal Communications Commission on Thursday, April 14, 2022, a day late contrary to the statute rule 47 CFR §1.46(c).

We, Complainants affirm that the foregoing statements and proof of service made herein are true to the best of our knowledge and belief. We are aware that if any of the foregoing is willfully false, we may be subject to punishment.

Dated April 14, 2022

Respectfully submitted.

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